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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:	) Case No. 08-35653 (KRH)
	)
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	) Chapter 11
	)
Debtors.	) (Jointly Administered)
	)

**STIPULATION BETWEEN ALFRED H. SIEGEL, AS TRUSTEE OF THE CIRCUIT CITY STORES, INC. LIQUIDATING TRUST AND SENSORMATIC ELECTRONIC CORPORATION TO CONSOLIDATE (I) DEBTORS' THIRTY-THIRD OMNIBUS OBJECTION TO CLAIMS (MODIFICATION AND /OR RECLASSIFICATION OF CERTAIN CLAIMS, (II) LIQUIDATING TRUSTS' SEVENTH OMNIBUS OBJECTION TO CLAIMS (REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS, DISALLOWANCE OF CERTAIN INVALID CLAIMS AND RECLASSIFICATIONS OF CERTAIN INCORRECTLY CLASSIFIED CLAIMS) AND (III) LIQUIDATING TRUST'S TWENTY-SIXTH OMNIBUS OBJECTION TO CLAIMS (DISALLOWANCE OF CERTAIN LATE AND/OR OTHERWISE INVALID CLAIMS) AS THEY RELATE TO CLAIM NUMBER 6317 FILED BY SENSORMATIC**

It is hereby stipulated by and between Alfred H. Siegel, the duly appointed trustee of the Circuit City Stores, Inc. Liquidating Trust (the "Trustee") and Sensormatic Electronic Corporation ("Sensormatic ") as follows:

**WHEREAS**, on January 27, 2009, Sensormatic filed its claim in the amount of \$108,263.45 as an administrative priority secured claim ("Claim No. 6317") in the chapter 11 cases of Circuit City Stores, Inc., et al. (the "Debtors").

**WHEREAS**, on August 21, 2009, the Debtors filed the *Debtors' Thirty-Third Omnibus Objection to Claims (Modification and/or Reclassification of Certain Claims)* (the "Debtors' Thirty-Third Omnibus Objection") [Docket No. 4590] in which it objected to the administrative priority status of Claim No. 6317 and to the secured status of a portion of Claim No. 6317.

**WHEREAS**, on September 15, 2009, Sensormatic filed its *Response to Debtors' Thirty-Third Omnibus Objection to Claims (Modification and/or Reclassification of Certain Claims)* (the "Response") [Docket No. 4906].

**WHEREAS**, on February 25, 2011, the Trustee filed the *Liquidating Trust's Seventh Omnibus Objection to Claims (Reduction of Certain Partially Invalid Claims, Disallowance of Certain Invalid Claims and Reclassifications of Certain Incorrectly Classified Claims)* (the "LT's Seventh Omnibus Objection") [Docket No. 10045] objecting to Claim No. 6317 on the basis that the claim was not supported by any documentation.

**WHEREAS**, on October 31, 2011, the Trustee filed the *Liquidating Trust's Twenty-Sixth Omnibus Objection to Claims (Disallowance of Certain Late and/or Otherwise Invalid Claims)* (the "LT's Twenty-Sixth Omnibus Objection") [Docket No. 11404] objecting to

Claim No. 6317 on the basis that the Debtor's books and records showed no liability on account of the claim.

**WHEREAS**, the Trustee and Sensormatic would like to avoid any unnecessary duplication with respect to Claim No. 6317, the Debtors' Thirty-Third Omnibus Objection, the Response, the LT's Seventh Omnibus Objection, and the LT's Twenty-Sixth Omnibus Objection.

**WHEREAS**, in the interest of judicial economy and in an effort to contain legal expense, the Trustee and Sensormatic have agreed to consolidate the Debtors' Thirty-Third Omnibus Objection, the LT's Seventh Omnibus Objection, and the LT's Twenty-Sixth Omnibus Objection, only as each relates to Claim No. 6317, and the Response for all purposes.

**IT IS THEREFORE STIPULATED AND AGREED** as follows:

1. The Debtors' Thirty-Third Omnibus Objection, the LT's Seventh Omnibus Objection, and the LT's Twenty-Sixth Omnibus Objection solely as each relates to Claim No. 6317, and shall be deemed to constitute a single objection to Claim No. 6317 and shall proceed to resolution under the LT's Twenty-Sixth Omnibus Objection; and
2. The Response shall be treated as a response to the consolidated LT's Twenty-Sixth Omnibus Objection to Claim No. 6317, provided, however, Sensormatic retains its right to file an additional response to the consolidated LT's Twenty-Sixth Omnibus Objection as long as such response is timely filed and the Liquidating Trust retains its right to file a timely reply to any such additional response.
3. This Stipulation shall be effective upon entry of an order by the United States Bankruptcy Court for the District of Eastern District of Virginia approving the Stipulation.

4. This Stipulation may be executed and delivered in counterparts, each of which shall constitute an original and which together shall constitute one and the same Stipulation. Furthermore, this Stipulation may be executed by facsimile copy, and facsimile signatures will be treated as original signatures.

5. Each individual executing this Stipulation on behalf of a corporation, partnership or other entity represents that he or she is duly authorized to execute and deliver this consent on behalf of the corporation or entity.

6. Each party to this Stipulation shall bear its own costs and expenses, including attorney's fees, in connection with the negotiation, preparation and performance of this Stipulation.

7. The Court shall retain jurisdiction to hear all disputes arising from this Stipulation.

TAVENNER & BERAN, P.L.C.

/s/ Paula S. Beran

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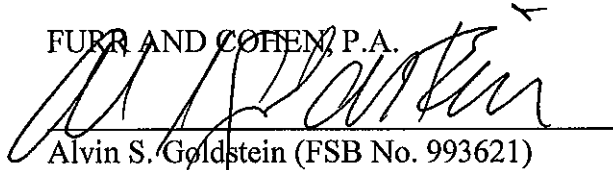
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